

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, on behalf of herself )  
and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:03-CV-12628 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

JOHN G. ESPOSITO, JR., on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10013 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

[Captions continued on next page]

**DECLARATION OF DAVID PASTOR IN SUPPORT OF MOTION OF  
THE BIOPURE LEAD PLAINTIFF GROUP TO CONSOLIDATE ACTIONS,  
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF  
LEAD PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

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JOSEPH L. KING, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10038 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

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MICHAEL E. CRIDEN, individually and )  
on behalf of all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10046 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, and CARL W. RAUSCH, )

Defendants. )

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ISRAEL SHURKIN and SHARON )  
SHURKIN, individually and on behalf of )  
all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10055 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, and CARL W. RAUSCH, )

Defendants. )

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JAMES J. NIZZO, VIRGINIA C. NIZZO, )  
and CARLO CILIBERTI, on behalf of )  
themselves and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10065 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

BARRY BROOKS, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10077 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

ANASTASIOS PERLEGIS, individually )  
and on behalf of all others similarly )  
situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10078 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

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MARTIN WEBER, on behalf of himself )  
and all others similarly situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

Civil Action No. 1:04-CV-10090 (NG)

BRUCE HAIMS, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

Civil Action No. 1:04-CV-10144 (NG)

MODEL PARTNERS LIMITED, )  
individually and on behalf of all others )  
similarly situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

Civil Action No. 1:04-CV-10155 (NG)

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JUNE E. PATENAUDE, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH, and  
RONALD F. RICHARDS,

Defendants.

Civil Action No. 1:04-CV-10179 (NG)

NANCY L. PINKNEY and GERTRUDE  
PINCKNEY, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, and CARL W. RAUSCH,

Defendants.

Civil Action No. 1:04-CV-10189 (NG)

W. KENNETH JOHNSON, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS  
A. MOORE, CARL W. RAUSCH, and  
RONALD F. RICHARDS,

Defendants.

Civil Action No. 1:04-CV-10190 (NG)

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GREGORY KRUSZKA, on behalf of )  
himself and all others similarly situated, )

Plaintiff, )

v. )

Civil Action No. 1:04-CV-10202 (NG)

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )

Defendants. )

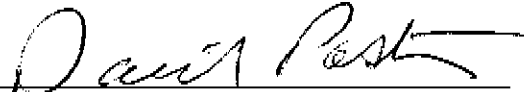
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David Pastor, declares under penalty of perjury this 1<sup>st</sup> day of March, 2004:

1. I am an attorney at and a member of the law firm of Gilman and Pastor, LLP. I submit this declaration in support of the motion of Neil & Susan Fineman, Michael Navilio, Robert Powell and Edward P. Collins (collectively, the "Biopure Lead Plaintiff Group") to consolidate actions, for the appointment of lead plaintiffs and for approval of lead plaintiffs' selection of lead counsel and liaison counsel.
2. Attached hereto as Exhibit A are true and correct copies of the signed certifications of class members the Biopure Lead Plaintiff Group pursuant to the requirements of the Private Securities Litigation Reform Act of 1995. 15 U.S.C. § 78u-4(a)(2).
3. Attached hereto as Exhibit B is a true and correct copy of the notice to class members concerning the first-filed of the above-captioned actions that was published on December 30, 2003 on *PR Newswire*, advising the public of the pendency of a class action filed on behalf of shareholders of Biopure Corporation ("Biopure").
4. Attached hereto as Exhibit C is a true and correct copy of a chart of the Biopure Lead Plaintiff Group's transactions in Biopure securities and approximate losses.
5. Attached hereto as Exhibit D is a of the Joint Declaration In Support of the Biopure Lead Plaintiff Group's Motion To Consolidate Actions, To Be Appointed Lead Plaintiffs and For Approval of Lead Plaintiffs' Selection of Lead Counsel and Liaison Counsel.
6. Attached hereto as Exhibit E is a true and correct copy of the firm biography for Schiffrin & Barroway, LLP, one of the law firm seeking the Court's approval as lead counsel.
7. Attached hereto as Exhibit F is a true and correct copy of the firm biography for Cauley Geller Bowman & Rudman, LLP, one of the law firms seeking the Court's approval as lead counsel.

8. Attached hereto as Exhibit G is a true and correct copy of the firm biography for Gilman and Pastor, LLP, the law firm seeking the Court's approval as liaison counsel.

I hereby declare under penalty of perjury that the foregoing is true and correct.

  
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DAVID PASTOR